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Attorney for Plaintiff
 DAREN HEATHERLY; and
 IRMA RAMIREZ

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

DAREN HEATHERLY; and IRMA
 RAMIREZ,

Plaintiffs,

v.

PATPONG THAI CUISINE, INC., a
 California Corporation dba PATPONG
 THAI CUISINE; ANTONIO
 CASTELLUCI; and MARCO A.
 CASTELLUCI,

Defendants.

CASE NO. CV-13-3649-EMC

**STIPULATION RE CONTINUING
 DEADLINE FOR THE PARTIES TO
 CONDUCT THE JOINT SITE
 INSPECTION; and [~~PROPOSED~~] ORDER
 THEREON**

Plaintiffs DAREN HEATHERLY and IRMA RAMIREZ, and Defendants PATPONG
 THAI CUISINE, INC., a California Corporation dba PATPONG THAI CUISINE; ANTONIO
 CASTELLUCI; and MARCO A. CASTELLUCI, by and through their respective counsel,
 respectfully request and stipulate, as follows:

1. **Whereas**, all defendants have been served with the summons and complaint and
 have answered plaintiffs' complaint;

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STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and
 [~~PROPOSED~~] ORDER THEREON

CASE NO. CV-13-3649-EMC

2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties were to have the Joint Site Inspection at Patpong Thai Cuisine, located at/near 2415 Clement Street, San Francisco, California completed by no later than November 19, 2013. However, due to scheduling conflicts and the holidays, the parties were/are unable to conduct the General Order 56 Joint Site Inspection;

3. **In light of the above**, the parties have agreed to conduct the joint site inspection on February 17, 2014.

IT IS SO STIPULATED:

That, plaintiffs DAREN HEATHERLY and IRMA RAMIREZ, and defendants PATPONG THAI CUISINE, INC., a California Corporation dba PATPONG THAI CUISINE; ANTONIO CASTELLUCI; and MARCO A. CASTELLUCI agree, stipulate and respectfully request that the last day for the parties and counsel to conduct the General Order 56 Joint Site Inspection of the premises be continued up to and including February 21, 2014.

This stipulation may be executed in counterparts, and all executed counterparts shall constitute an agreement which shall be binding upon all parties hereto, notwithstanding that the signatures of all of the parties' designated representatives do not appear on the same page. Photocopies and facsimile shall have the same force and effect as originals.

Respectfully submitted,

Dated: December 11, 2013

THOMAS E. FRANKOVICH, Esq.

A PROFESSIONAL LAW CORPORATION

By: ___ /s/Thomas E. Frankovich_____

Thomas E. Frankovich
Attorney for Plaintiff DAREN HEATHERLY; and
Plaintiff IRMA RAMIREZ

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STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and
[PROPOSED] ORDER THEREON

CASE NO. CV-13-3649-EMC

1 Dated: 12/12, 2013

LAW OFFICES OF JOSEPH A. SACRAMENTO,

2
3
4 By: 

David J. Foran, Esq.

Attorney for Defendants ANTONIO CASTELLUCI;
and MARCO A. CASTELLUCI

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6
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8 Dated: _____, 2013

JEFFER MANGELS BUTLER & MITCHELL LLP,

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10
11 By: _____

Stuart K. Tubis, Esq.

Attorney for Defendant PATPONG THAI CUISINE,
INC., a California Corporation dba PATPONG
THAI CUISINE

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16 **PROPOSED ORDER**

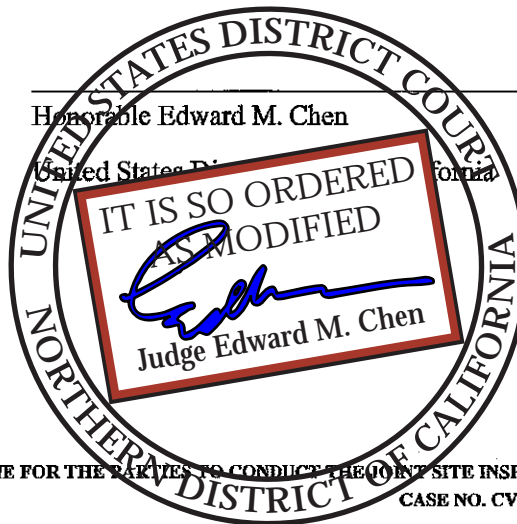
17 **IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site
18 inspection of the premises be continued up to and including 2/21, 2014.

19 The CMC is reset for 3/20/14 at 9:00 a.m. A joint CMC statement
20 is due 3/13/14.

21 Dated: 1/6/14, 2013

22 Honorable Edward M. Chen

23 United States District Court for the Northern District of California



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28 STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and
[PROPOSED] ORDER THEREON

CASE NO. CV-13-3649-EMC

1 Dated: _____, 2013

LAW OFFICES OF JOSEPH A. SACRAMENTO,


2
3
4 By: _____

5 David J. Foran, Esq.

6 Attorney for Defendants ANTONIO CASTELLUCI;
7 and MARCO A. CASTELLUCI

8 Dated: _____, 2013

JEFFER MANGELS BUTLER & MITCHELL LLP,

9
10
11 By:  _____

12 Stuart K. Tubis, Esq.

13 Attorney for Defendant PATPONG THAI CUISINE,
14 INC., a California Corporation dba PATPONG
15 THAI CUISINE

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17 **PROPOSED ORDER**

18 **IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site
19 inspection of the premises be continued up to and including _____, 2014.

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21 Dated: _____, 2013

22 _____
Honorable Edward M. Chen

23 United States District Judge of California
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